

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

DONNA CURLING, ET AL.,	)	
	)	
Plaintiffs,	)	
	)	CIVIL ACTION
vs.	)	
	)	FILE NO. 1:17-cv-2989-AT
BRAD RAFFENSPERGER,	)	
ET AL.,	)	
	)	
Defendants.	)	

**COALITION PLAINTIFFS’  
NOTICE OF INTENT TO SERVE SUBPOENA ON  
JENNIFER DORAN—MORGAN COUNTY ELECTIONS DIRECTOR**

Pursuant to Rule 45(a) of the Federal Rules of Civil Procedure, Plaintiffs Coalition for Good Governance, William Digges III, Laura Digges, Ricardo Davis, and Megan Missett (“Coalition Plaintiffs”) hereby notify all parties that they intend to serve a subpoena on Jennifer Doran – Morgan County Elections Director, to obtain, inter alia, evidence relating to the Morgan County Election Server. *See* Exhibit 1 attached hereto.

This 29th day of September, 2020.

Respectfully submitted,

/s/ Cary Ichter  
CARY ICHTER

Georgia Bar No. 382515  
**ICHTER DAVIS LLC**  
3340 Peachtree Road NE, Suite 1530  
Atlanta, Georgia 30326  
Tel.: 404.869.7600  
Fax: 404.869.7610  
[cichter@ichterdavis.com](mailto:cichter@ichterdavis.com)

AND

Bruce P. Brown  
Georgia Bar No. 064460  
[bbrown@brucebrownlaw.com](mailto:bbrown@brucebrownlaw.com)

**Bruce P. Brown Law LLC**  
1123 Zonolite Road NE, Suite 6  
Atlanta, Georgia 30306  
Tel.: 404.881.0700

*Attorneys for Plaintiffs Coalition for Good  
Governance, William Digges III, Laura  
Digges, Ricardo Davis, and Megan Missett*

### **CERTIFICATE OF COMPLIANCE**

I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

*/s/ Cary Ichter*\_\_\_\_\_

Cary Ichter

Georgia Bar No. 382515

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

<b>DONNA CURLING, ET AL.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	<b>CIVIL ACTION</b>
<b>v.</b>	)	
	)	<b>FILE NO. 1:17-CV-2989-AT</b>
<b>BRAD RAFFENSPERGER,</b>	)	
<b>ET AL.,</b>	)	
	)	
<b>Defendants.</b>	)	

**CERTIFICATE OF SERVICE**

I hereby certify that on September 29, 2020, I served a true and correct copy of the foregoing **COALITION PLAINTIFFS’ NOTICE OF INTENT TO SERVE SUBPOENA ON JENNIFER DORAN—MORGAN COUNTY ELECTIONS DIRECTOR** along with **EXHIBIT 1** thereto, on counsel of record by electronic delivery of a PDF version to the counsel of record as set forth below, and I also filed the foregoing document with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing to all attorneys of record.

/s/ Cary Ichter  
Cary Ichter  
Georgia Bar No. 382515